

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND DIVISION

IN RE:

ARABELLA PETROLEUM COMPANY, LLC,

Debtor. § CHAPTER 11

MORRIS D. WEISS, CHAPTER 11
TRUSTEE FOR ARABELLA
PETROLEUM COMPANY, LLC,

Plaintiff,

v.

ARABELLA EXPLORATION INC.,
ARABELLA EXPLORATION LLC,
ARABELLA OPERATING LLC,
TRANS-TEXAS LAND & TITLE, LLC,
PLATINUM PARTNERS CREDIT
OPPORTUNITIES MASTER FUND LP,
PLATINUM LONG TERM GROWTH
VIII, LLC, and JASON HOISAGER,
Individually,

Defendants.

§ Case No. 15-70098-RBK-11

§ Adversary No. 16-07002-RBK

DEFENDANT JASON HOISAGER'S RULE 7026 DISCLOSURES

TO: PLAINTIFF, BY AND THROUGH COUNSEL AS FOLLOWS:

Christopher G. Bradley
Waller Lansden Dortch & Davis, LLP
100 Congress Ave., Suite 1800
Austin, Texas 78701

Eric J. Taube
Waller Lansden Dortch & Davis, LLP
100 Congress Ave., Suite 1800
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Mark Curtis Taylor
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100 Congress Ave., Suite 1800
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Jason Hoisager, individually (“Hoisager” or “Defendant”) in the above styled and numbered adversary proceeding and Defendant herein, submits the following disclosures pursuant to Rule 7026 of the Federal Rules of Bankruptcy Procedure and Rule 26(a)(1) of the Federal Rules of Civil Procedure:

1. Rule 26(a)(1)(A)(i) - Individuals with discoverable information in support of Defendant's claims:

<u>Person</u>	<u>Subject</u>
Jason Hoisager c/o Kevin G. Herd/Joseph F. Postnikoff Goodrich Postnikoff & Associates, LLP 801 Cherry Street, Suite 1010 Fort Worth, Texas 76102	All financial transfers.
Trans-Texas Land & Title, LLC c/o Kevin G. Herd/Joseph F. Postnikoff Goodrich Postnikoff & Associates, LLP 801 Cherry Street, Suite 1010 Fort Worth, Texas 76102	Matters related to Trans-Texas Land & Title, LLC.
Martin D. Weiss, Chapter 11 Trustee for Arabella Petroleum Company, LLC c/o Waller Lansden Dortch & Davis, LLP 100 Congress Ave., Suite 1800 Austin, Texas 78701	Matters related to Arabella Petroleum Company, LLC.
Arabella Exploration, Inc. c/o Katherine T. Hopkins/Clay M. Taylor Kelly Hart & Hallman LLP 201 Main Street, Suite 2500 Fort Worth, Texas 76102	Matters related to Arabella Exploration, Inc.

Arabella Exploration, LLC c/o Katherine T. Hopkins/Clay M. Taylor Kelly Hart & Hallman LLP 201 Main Street, Suite 2500 Fort Worth, Texas 76102	Matters related to Arabella Exploration, LLC.
Arabella Operating, LLC c/o Katherine T. Hopkins/Clay M. Taylor Kelly Hart & Hallman LLP 201 Main Street, Suite 2500 Fort Worth, Texas 76102	Matters related to Arabella Operating, LLC.
Platinum Partners Credit Opportunities Master Fund, LP c/o Michael E. Baum/Joseph K. Grekin Schafer & Weiner, PLLC 40950 Woodward Ave., Suite 100 Bloomfield Hills, Michigan 48304	Matters related to Platinum Partners Credit Opportunities, Master Fund, LP.
Platinum Long Term Growth VIII, LLC c/o VCOPR Services, LLC c/o Michael E. Baum/Joseph K. Grekin Schafer & Weiner, PLLC 40950 Woodward Ave., Suite 100 Bloomfield Hills, Michigan 48304	Matters related to Platinum Long Term Growth VIII, LLC c/o VCOPR Services, LLC.

Defendant will supplement this required disclosure as necessary in the course of conduct of discovery in this proceeding.

2. Rule 26(a)(1)(A)(ii) - Description by category and location of documents, etc. in the possession, custody, or control of the Defendant that the Defendant may use to support its claims:

Most of the documents and information relevant to Defendant's claims in this action are in the possession, custody and control of individuals and entities other than Defendant, including but not limited to, Jason Hoisager and Kelley Wohlfahrt.

Subject to attorney-client privilege and the attorney-work product doctrine, all documents, data compilations and tangible things that are in the possession, custody or control of the Defendant that Defendant relies upon in support of his claims against Plaintiff shall be made available for inspection and copying at a time mutually convenient to all parties at the law offices of Goodrich Postnikoff

& Associates, LLP, 801 Cherry Street, Suite 1010, Fort Worth, Texas 76102. In particular, Defendant will make available the following general categories of documents:

<u>Document</u>	<u>Location</u>
Bank Statements	509 Pecan St., Ste. 200 Fort Worth, Texas 76102
Transactional Documents	509 Pecan St., Ste. 200 Fort Worth, Texas 76102

3. Rule 26(a)(1)(A)(iii) - Computation of damages:

Defendant has not calculated damages the subject of this adversary proceeding to date. This disclosure is subject to supplementation as additional information and/or documents come into the possession, custody, or control of the Defendant.

4. Rule 26(a)(1)(A)(iv) – Insurance Agreements:

Executive Advantage Policy issued to Arabella Exploration, Inc. (f/k/a Arabella Exploration, Lone Oak Acquisition Company) by Liberty Insurance Underwriters Inc., as Policy No. DONYAAXNLS002 a renewal of DONYAAXNNLS001.

5. Rule 26(a)(2) – Disclosure of Expert Testimony:

Defendant has not yet designated experts but will supplement this disclosure according to Fed. R. Civ. P. 26(e) should the need arise.

Defendant reserves the right to supplement these Rule 26(a) disclosure responses as discovery progresses in this matter.

DATED this the 20th day of July, 2016.

Respectfully submitted:

GOODRICH POSTNIKOFF &
ASSOCIATES, LLP
801 Cherry Street, Suite 1010
Fort Worth, Texas 76102
Telephone – 817.347.5261
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By: /s/ Kevin G. Herd

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COUNSEL FOR DEFENDANT JASON
HOISAGER, INDIVIDUALLY

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 20th day of July, 2016, a copy of the foregoing Defendant's Rule 26(a)(1) Disclosures was served via ECF on the parties registered with the Court to receive ECF.

/s/ Kevin G. Herd
Kevin G. Herd